

1 WILLIAM H. BROWN, ESQ. (7623)  
2 BROWN MISHLER, PLLC  
3 911 N. Buffalo Dr., Ste. 202  
4 Las Vegas, Nevada 89128  
5 Tel: (702) 816-2200  
6 Email: [WBrown@BrownMishler.com](mailto:WBrown@BrownMishler.com)  
7 *Attorney for Defendant*  
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

13 vs.

**UNOPPOSED MOTION TO  
ALLOW PRETRIAL-APPROVED  
TRAVEL**

14 ADALI ARNULFO ESCALANTE-  
15 TRUJILLO, et al.,

16 Defendants.

17 Certification: This motion is timely filed.

18 Comes now the defendant, Pedro Montalvo, by and through his counsel  
19 of record, William Brown, of BROWN MISHLER, PLLC, and hereby moves  
20 this Court for an order allowing pretrial-approved travel outside Nevada.  
21

22 This request is based on the Points and Authorities attached hereto.

23 Dated: June 29, 2021

24 By /s/ William H. Brown  
25 WILLIAM H. BROWN  
26 *Attorney for Pedro Montalvo*  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10

**MEMORANDUM OF  
POINTS AND AUTHORITIES**

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

Defendant Pedro Montalvo's pretrial release conditions do not allow him to travel outside Nevada, but he regularly travels to California for court approved child visitation. To save time and avoid piecemeal travel requests going forward, Mr. Montavlo asks that the Court modify his pretrial release conditions such that Mr. Montalvo be allowed to travel outside Nevada with the prior approval of pretrial services.

23  
24  
25  
26  
27  
28

The defense has communicated with Mr. Montalvo's Pretrial Services Officer, and the government, and neither opposes this request.

Dated: June 29, 2021

By /s/ William H. Brown  
WILLIAM H. BROWN  
*Attorney for Pedro Montalvo*

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of BROWN MISHLER, PLLC, and is a person of such age and discretion as to be competent to serve papers, and that on June 29, 2021 he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ALLOW TO ALLOW PRETRIAL-APPROVED TRAVEL** by electronic service (ECF)

/s/ William Brown  
Employee of BROWN MISHLER,  
PLLC

1 WILLIAM H. BROWN, ESQ. (7623)  
2 BROWN MISHLER, PLLC  
3 911 N. Buffalo Dr., Ste. 202  
4 Las Vegas, Nevada 89128  
5 Tel: (702) 816-2200  
6 Email: [WBrown@BrownMishler.com](mailto:WBrown@BrownMishler.com)  
7 *Attorney for Defendant*  
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

**{PROPOSED}**

13 vs.

**ORDER ALLOWING PRETRIAL-  
APPROVED TRAVEL**

14 ADALI ARNULFO ESCALANTE-  
15 TRUJILLO, et al.,

16 Defendants.

17 Having considered defendant Pedro Montalvo's unopposed motion to  
18 allow pretrial-approved travel, it is hereby ordered that the motion is  
19 granted, and Mr. Montalvo's pretrial release conditions are hereby modified  
20 such that Mr. Montalvo may travel outside Nevada with the prior approval of  
21 his Pretrial Officer.  
22

23 Dated: June 30, 2021



24 RICHARD F. BOULWARE, II  
25 UNITED STATES DISTRICT JUDGE  
26  
27  
28